

Debtor.

Case No. 22-90035 (MI)

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3. Burns Charest stated that it would produce documents by the end of this week (by Friday, January 27, 2023). Notably, Burns Charest disclosed during the meet-and-confer that it has not yet contacted all of its clients for documents within the possession, custody, or control of claimants or potential claimants. Burns Charest could give no anticipated timeframe for the production of these documents.

4. In addition to document issues, there is a present dispute concerning the availability of UCC members for depositions, and whether the Debtor may inquire into issues concerning the UCC. The Debtor is filing a motion to compel for the Court's resolution concerning the deposition of UCC member Glaston Quashie, which is currently noticed for February 3, 2023, in Miami, Florida.

5. The Debtor will continue to seek responses to its discovery requests and will continue to attempt to work with the UCC and Burns Charest to ensure that it receives timely responses.

Houston, TX
January 23, 2023

/s/ Matthew D. Cavanaugh

JACKSON WALKER LLP

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*Co-Counsel to the Debtor
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Certificate of Service

I certify that on January 23, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Matthew D. Cavanaugh
Matthew D. Cavanaugh

Exhibit A

From: [Higgins, John F.](#)
To: [Williams, Michael F.](#)
Cc: [Porter, Katherine](#); [Nary, Charles S.](#); [Zieg, Sharon](#); [Brimmage, Marty](#); [Mulvihill, Joseph \(External\)](#); [Preis, Arik](#); [Brady, Robert](#); [Doorley, Kate](#); [Brauner, Sara](#); [Salwen, James](#); [Hurley, Mitchell](#); [HONX AKIN](#); [Burns, Warren \(External\)](#); [Harron, Edwin](#); [#HONX_CoreTeam](#); [*Carolyn.OConnor@wilsonelser.com](#); [*Charlie.Jones@haynesboone.com](#); [*Martha.Wyrick@haynesboone.com](#); [*Charles.beckham@haynesboone.com](#); [*Arsalan.Muhammad@haynesboone.com](#); [ReNecia.Sherald@haynesboone.com](#)
Subject: Re: HONX - document productions
Date: Tuesday, January 17, 2023 11:26:14 PM

This message is from an EXTERNAL SENDER

Be cautious, particularly with links and attachments.

No it was my understanding that we were trying to schedule a meet and confer.

John F. Higgins
Porter Hedges LLP
1000 Main St., 36th Floor
Houston, Tx. 77002
jhiggins@porterhedges.com
(713) 226-6648 office
(713) 226-6628 fax

On Jan 17, 2023, at 10:16 PM, Williams, Michael F. <mwilliams@kirkland.com> wrote:

John — Yes. The Kirkland & Ellis distribution list is a recipient.

Are you able to answer our questions on behalf of Burns Charest?

Would appreciate receiving a response. Thank you.

Michael F. Williams, P.C.

KIRKLAND & ELLIS LLP
1301 Pennsylvania Ave., NW, Washington, DC 20004
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M +1 703 203 5249<<tel:+12031220371208854>>

michael.williams@kirkland.com<<mailto:first.last@kirkland.com>>

On Jan 17, 2023, at 11:05 PM, Higgins, John F. <JHiggins@porterhedges.com> wrote:

Is Chris on this chain? John F. Higgins Porter Hedges LLP 1000 Main St. , 36th Floor
Houston, Tx. 77002 jhiggins@porterhedges.com (713) 226-6648 office (713) 226-6628 fax
On Jan 17, 2023, at 10: 02 PM, Williams, Michael F. <mwilliams@kirkland.com>

Is Chris on this chain?

John F. Higgins
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(713) 226-6628 fax

On Jan 17, 2023, at 10:02 PM, Williams, Michael F. <mwilliams@kirkland.com> wrote:

Katherine — I received your letter, but it does not answer our questions. Your letter indicates that the UCC is making documents that were produced in the mediation available for the Debtor's use in the estimation proceedings, subject to new conditions that were not authorized by the Court and subject to various new objections. Your letter does not address any documents that the UCC had not previously made available in the data site during mediation. If I am incorrect about that, then please advise.

Does your letter address all of the documents that the UCC and Burns Charest intend to produce responsive to our Third and Fourth Requests for Production, or should we expect an additional production of documents? Please advise as soon as possible and also advise when we can expect to receive any additional documents. Thank you.

Michael F. Williams, P.C.

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michael.williams@kirkland.com<mailto:first.last@kirkland.com>

On Jan 17, 2023, at 10:47 PM, Porter, Katherine <kporter@akingump.com> wrote:

Hi Mike – I sent you a letter earlier tonight. Best regards, Katherine Porter AKIN GUMP
STRAUSS HAUER & FELD LLP Direct: +1 212. 872. 7467 | Internal: 37467 From:
Williams, Michael F. <mwilliams@kirkland.com> Sent: Tuesday, January
Hi Mike – I sent you a letter earlier tonight. Best regards,

Katherine Porter
AKIN GUMP STRAUSS HAUER & FELD LLP
Direct: +1 212.872.7467<tel:+12128727467> | Internal: 37467<tel:37467>

From: Williams, Michael F. <mwilliams@kirkland.com>
Sent: Tuesday, January 17, 2023 10:45 PM
To: Porter, Katherine <kporter@akingump.com>

Cc: Nary, Charles S. <charles.nary@kirkland.com>; Zieg, Sharon <SZIEG@ycst.com>; Brimmage, Marty <mbrimmage@akingump.com>; Mulvihill, Joseph (External) <jmulvihill@ycst.com>; Preis, Arik <apreis@akingump.com>; Brady, Robert <RBRADY@ycst.com>; Doorley, Kate <kdoorley@akingump.com>; Brauner, Sara <sbrauner@akingump.com>; Salwen, James <jsalwen@akingump.com>; Hurley, Mitchell <mhurley@AkinGump.com>; HONX AKIN <HONXAKIN@akingump.com>; Burns, Warren (External) <wburns@burnscharest.com>; Harron, Edwin <eharron@ycst.com>; #HONX_CoreTeam <HONX_CoreTeam@kirkland.com>; *Carolyn.OConnor@wilsonelser.com <Carolyn.OConnor@wilsonelser.com>; *Charlie.Jones@haynesboone.com <Charlie.Jones@haynesboone.com>; *Martha.Wyrick@haynesboone.com <Martha.Wyrick@haynesboone.com>; *Charles.beckham@haynesboone.com <Charles.beckham@haynesboone.com>; *Arsalan.Muhammad@haynesboone.com <Arsalan.Muhammad@haynesboone.com>; ReNecia.Sherald@haynesboone.com; Higgins, John (External) <JHiggins@porterhedges.com>
Subject: Re: HONX - document productions

****EXTERNAL Email****

Could somebody please answer my question.
Michael F. Williams, P.C.

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michael.williams@kirkland.com<mailto:first.last@kirkland.com>

On Jan 17, 2023, at 10:01 AM, Williams, Michael F.
<mwilliams@kirkland.com<mailto:mwilliams@kirkland.com>> wrote:
Please advise when we can expect to receive the document productions from the UCC and Burns Charest. Thank you.

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